

SeekR

Privacy Policy

Effective Date: March 9, 2026 | Last Updated: March 9, 2026

Version 1

Welcome to SeekR ("we", "our", or "us"). We are committed to protecting your personal information and your right to privacy. This Privacy Policy explains how we collect, use, share, and safeguard your data when you use the SeekR travel platform, including our website at seek-r.world and our application at app.seek-r.world (collectively, the "Service").

By using our Service, you agree to the collection and use of information in accordance with this policy. If you do not agree with the terms described here, please discontinue use of the Service.

1. Data Controller Identity

The data controller responsible for your personal information is:

SeekR

Ritwik Sinha, trading as SeekR

N-1204, Hanumanthappa Layout, Purva Palm Beach

Bengaluru, 560077, India

GST Number: 29EJUPS1436K1ZB

Email: ritwik@seek-r.life

Website: <https://seek-r.world>

For all data protection enquiries, please contact us at ritwik@seek-r.life. We aim to respond to all privacy-related enquiries within 5 business days.

2. Data Protection Officer

We have assessed whether we are required to appoint a Data Protection Officer (DPO) under applicable data protection law. At present, given our current scale of operations, this appointment is not mandatory.

As SeekR grows and the scale of personal data processing increases — particularly travel preferences, community content, and behavioural data — we will reassess this obligation on an ongoing basis. If a DPO is appointed, their contact details will be published in this policy and made available to all users.

3. Information We Collect

3.1 Information You Provide Directly

When you use SeekR, you may provide us with the following information:

- Account information: name, email address, and password when you register
- Profile preferences: travel style, dietary requirements, accessibility needs, and budget range
- Travel inputs: destination, travel dates, group size, interests, and accommodation preferences
- Passport nationality: provided voluntarily when requesting visa and entry requirement information
- Payment information: processed securely through Stripe — we do not store your payment card details
- Community and social content: reviews, photos, posts, shared itineraries, and travel stories submitted to SeekR's community features
- Communications: messages you send to our support team or feedback you submit

Providing information marked as required at registration (name and email address) is a contractual necessity — without it we cannot create your account or deliver the Service. All other information is voluntary. Omitting optional information may reduce the personalisation of your experience but will not prevent you from accessing the platform.

3.2 Information Collected Automatically

When you access the Service, we automatically collect certain technical information:

- Device information: device type, operating system, browser type and version
- Usage data: pages visited, features used, time spent, and interaction patterns
- IP address and approximate geographic location (country/city level)
- Cookies and similar tracking technologies (see Section 9 for details)
- Referral URLs and search queries used to reach our platform

3.3 Information from Third Parties

Where we obtain data about you from a source other than directly from you, we are required to be transparent about the source and category of that data. The categories and sources are:

- **Google / Apple sign-in:** your name, email address, and profile picture, sourced from Google LLC or Apple Inc., if you choose to authenticate using these providers
- **Flight and hotel APIs:** pricing and availability data returned in response to your anonymous search queries — sourced from third-party travel data providers such as SerpApi and Amadeus
- **Visa and travel advisory APIs:** destination-specific entry requirements and regulatory information, sourced from travel information providers based on the passport nationality you provide

We do not obtain sensitive categories of personal data — such as health, biometric, or religious data — from third parties without your explicit consent.

4. How SeekR Uses Artificial Intelligence — Data Minimisation

This section explains exactly what data is and is not sent to our AI providers, in the interest of full transparency.

4.1 What SeekR Sends to AI

SeekR only transmits the minimum anonymous travel planning prompts necessary to fulfil your request. This includes:

- Anonymous travel prompts such as destination, activity preferences, and hotel choices when generating or editing an itinerary
- Passport nationality, sent as an isolated anonymous query with no name, account identifier, email, or personal profile attached, solely to retrieve visa and entry requirement information

SeekR does NOT send to any AI model:

- Your name, email address, or any account identifier
- Your photos, reviews, or community content
- Your payment information or transaction history
- Your device information or IP address
- Any data that could directly identify you as an individual

4.2 AI Training Commitment

SeekR will never use your personal data, reviews, photos, or any other personally identifiable content to train, fine-tune, or improve any AI or machine learning model without your explicit prior consent.

SeekR sends only anonymous, unidentified travel planning prompts to third-party AI providers solely to process and fulfil your immediate request. This constitutes inference use only — not

training. Passport nationality, where provided for visa information, is sent as an isolated anonymous query with no name, account identifier, or personal profile attached. SeekR only works with AI providers whose terms explicitly prohibit the use of API inputs for model training or improvement.

In the future, SeekR may develop its own AI models to improve the platform. If we ever wish to use your data for this purpose, we will ask for your explicit, separate, and informed consent at that time. You will never be enrolled automatically. Declining will not affect your access to or use of the Service in any way.

5. Legal Bases for Processing (UK & EEA Users)

For users in the United Kingdom and European Economic Area, we are required to identify a legal basis for each type of personal data processing we carry out. The legal bases we rely on are:

- **Contractual necessity:** we process your name, email, payment details, and travel inputs because this is necessary to deliver the Service you have purchased or registered for. Without this processing, we cannot provide the Service
- **Legitimate interests:** we rely on this basis for the following specific purposes: (i) detecting and preventing fraud and abuse of the platform, (ii) improving the accuracy and relevance of our AI engine using anonymised, aggregated usage data only, (iii) ensuring the technical security and integrity of our infrastructure, and (iv) sending service-critical operational announcements. We have assessed that these interests are proportionate and not overridden by your rights and freedoms
- **Consent:** we rely on your consent for sending direct marketing communications, placing non-essential cookies, and any future use of your data for AI model training. You may withdraw consent at any time without affecting the lawfulness of any processing carried out before withdrawal
- **Legal obligation:** we are required by law to retain certain financial records and to respond to lawful regulatory or judicial requests

You have the right to object to processing carried out on the basis of legitimate interests at any time by contacting ritwik@seek-r.life. We will cease such processing unless we can demonstrate compelling legitimate grounds that override your interests.

6. Automated Decision-Making and Profiling

This section is particularly important as SeekR's core Service relies on AI-driven processing.

6.1 Nature of Automated Processing

When you submit a travel request or edit an itinerary, SeekR uses automated processing — including artificial intelligence and machine learning — to generate personalised travel plans and recommendations. This means a computer system, rather than a human, produces your itinerary based on the inputs you provide.

Specifically, our system:

- Analyses your stated preferences — destination, dates, budget, travel style, interests, group size, and activity choices
- Cross-references these inputs against destination data, flight availability, accommodation options, and activity recommendations
- Generates a structured, personalised travel plan without individual human review of each output

6.2 Logic and Significance of Automated Processing

Our automated system is powered by third-party large language models (LLMs) that process anonymous travel prompts to produce personalised recommendations. The model weights the preference signals you provide to generate a sequenced, day-by-day travel plan. The output directly determines what destinations, routes, timings, activities, and estimated costs are presented to you.

SeekR's AI-generated outputs are recommendations only — they are advisory in nature and do not constitute binding decisions. They do not affect your legal rights, financial standing, creditworthiness, or access to any service beyond SeekR itself.

6.3 Your Rights Regarding Automated Processing

Because our automated processing is necessary to deliver the service you have explicitly requested and purchased, it is lawful without requiring separate consent. However, you retain the following rights at all times:

- The right to request human review of any AI-generated output — contact ritwik@seek-r.life
- The right to express your point of view and contest any recommendation
- The right to request an explanation of the key factors that influenced your personalised output
- The right to request that we regenerate your plan with adjusted inputs

7. How We Use Your Information

7.1 Providing and Improving the Service

- Generate personalised AI-powered travel plans, itineraries, and recommendations based on your inputs

- Facilitate travel-related features including search, planning, community, and future booking capabilities
- Power social and community features such as travel reviews, shared itineraries, and community posts
- Process transactions and deliver purchased content and services
- Improve platform quality and AI accuracy using only anonymised, aggregated, non-personal usage data

7.2 Communication

- Send transaction confirmations and service delivery notifications
- Respond to customer support and data protection enquiries
- Send product updates and service announcements — you may opt out of non-essential communications at any time
- Send marketing communications only where you have given explicit, prior, informed consent

7.3 Safety and Legal Compliance

- Detect and prevent fraudulent transactions or abuse of the Service
- Comply with applicable laws in the UK, EU, Australia, India, and other jurisdictions where we operate
- Enforce our Terms and Conditions
- Respond to lawful requests from public authorities — we will notify you where legally permitted

8. How We Share Your Information

We do not sell, rent, or trade your personal information to any third party for their own marketing or commercial purposes. We share your data only in the following limited and controlled circumstances:

8.1 Service Providers

We engage trusted third-party vendors who assist us in operating the Service. All service providers are bound by Data Processing Agreements that require them to protect your data and use it solely for the purposes we specify. They include:

- Cloud hosting providers (infrastructure and data storage)
- Stripe (secure handling of all payment transactions)
- AI service providers (receiving only anonymous travel prompts as described in Section 4)
- Flight, hotel, and visa API providers (receiving only anonymous query parameters)
- Email delivery services (transactional and opted-in marketing emails)

- Analytics platforms (receiving only anonymised, aggregated usage data)

8.2 Business Transfers

In the event of a merger, acquisition, restructuring, or sale of assets, your information may be transferred to the acquiring entity. We will notify you at least 30 days in advance via email. The acquiring entity will be bound by obligations equivalent to those in this policy. If you do not agree to the transfer, you may close your account before it takes effect without penalty.

8.3 Legal Requirements

We may disclose your information when required by law, court order, or governmental authority. Where legally permitted, we will notify you before complying with such a request. We will always review such requests carefully and disclose only the minimum necessary information.

9. Cookies and Tracking Technologies

We use cookies and similar technologies to operate and improve the Service. We do not place any non-essential cookies on your device before you have given your explicit, informed consent. This applies to both seek-r.world and app.seek-r.world.

9.1 What Happens Before You Consent

When you first visit our platform, only strictly essential cookies are active. Our cookie consent banner is displayed immediately upon your first visit. No analytics, preference, or marketing cookies are placed until you actively choose to accept them.

9.2 Cookie Categories

- **Essential cookies:** required for the Service to function — session management, authentication, and security. These are placed without consent as they are strictly necessary for the Service to operate
- **Analytics cookies:** collect anonymised data about how users interact with our platform. Only placed after your explicit consent
- **Preference cookies:** remember your settings, language, and personalisation choices. Only placed after your explicit consent
- **Marketing cookies:** used to deliver relevant promotional content. Only placed after your explicit consent and never used for third-party ad targeting without your knowledge

9.3 Managing Your Cookie Preferences

You can change or withdraw your cookie consent at any time by clicking the 'Cookie Settings' link in the footer of our website or application. You may also manage cookies through your browser settings, though disabling essential cookies will affect the functionality of the Service. Full details of every cookie we use are available in our Cookie Policy at seek-r.world/cookies.

10. International Data Transfers

SeekR is operated from India and your information may be processed and stored in countries other than your country of residence, including India, the European Economic Area, the United Kingdom, the United States, and Australia, depending on the service providers we use.

Where we transfer personal data from the UK or EEA to a country that has not been deemed to provide an equivalent level of data protection, we put in place appropriate safeguards including:

- Standard Contractual Clauses approved by the UK Information Commissioner's Office or the European Commission
- Adequacy decisions issued by the UK Secretary of State or European Commission recognising equivalent protection
- Other legally recognised transfer mechanisms under applicable data protection law

You may request a copy of the relevant transfer safeguards we rely on by contacting ritwik@seek-r.life.

11. Data Retention

We retain your personal data only as long as necessary for the purposes described in this policy or as required by law. Our standard retention periods are:

- Account data: retained for the duration of your account, plus 2 years following account deletion
- Travel plan and itinerary data: retained for 12 months to allow re-access and re-download
- Community and social content: retained until you delete it or request erasure, subject to legal holds
- Payment records: retained for 7 years to comply with financial and tax regulatory requirements including Indian GST obligations
- Support correspondence: retained for 3 years from the date of last contact
- Consent records: retained for the duration of the processing activity plus 3 years as evidence of compliance
- Cookie consent logs: retained for 3 years
- Analytics data: retained in anonymised, aggregated, non-personal form indefinitely

Where deletion of your data is not immediately possible due to a legal retention obligation, we will restrict its processing, clearly document the reason for retention, and inform you of the applicable retention period upon request.

12. Your Rights

You have the right to lodge a complaint with a data protection supervisory authority at any time and without prior notice to us. UK users may contact the Information Commissioner's Office (ICO) at ico.org.uk or by phone on 0303 123 1113. EEA users may contact the supervisory authority in their EU member state of residence. Australian users may contact the Office of the Australian Information Commissioner (OAIC) at oaic.gov.au. Indian users may refer to the Data Protection Board of India once operational under the DPDP Act 2023.

12.1 UK and EEA Users

You have the following rights under UK and EU data protection law. These rights are not absolute and may be subject to conditions or limitations. The article references below are provided to help you if you need to reference these rights formally with a supervisory authority:

- **Right of access (Article 15):** obtain a copy of the personal data we hold about you and information about how we process it
- **Right to rectification (Article 16):** request correction of inaccurate or incomplete personal data without undue delay
- **Right to erasure (Article 17):** request deletion of your personal data where it is no longer necessary, where consent is withdrawn, or where processing is unlawful — subject to legal retention obligations
- **Right to restriction of processing (Article 18):** request that we limit processing of your data while accuracy is contested or an objection is pending
- **Right to data portability (Article 20):** receive your personal data in a structured, commonly used, machine-readable format and transmit it to another controller, where technically feasible
- **Right to object (Article 21):** object to processing based on our legitimate interests or for direct marketing — we will cease unless we can demonstrate compelling legitimate grounds
- **Rights related to automated decision-making (Article 22):** request human review of any AI-generated output, express your point of view, and contest recommendations — see Section 6.3
- **Right to withdraw consent (Article 7(3)):** withdraw consent for any consent-based processing at any time — this does not affect the lawfulness of processing before withdrawal

12.2 Australian Users

Under the Australian Privacy Act 1988 and the Australian Privacy Principles, you have the right to:

- Access personal information we hold about you and be told how it is used (APP 12)
- Request correction of information that is inaccurate, out-of-date, incomplete, irrelevant, or misleading (APP 13)

- Make a complaint to the OAIC at oaic.gov.au if you believe we have breached the Australian Privacy Principles

12.3 Indian Users

India's Digital Personal Data Protection Act 2023 is being phased in. As it comes into force, SeekR will update this policy to reflect any additional rights it confers. In the meantime, you may contact us at ritwik@seek-r.life with any data-related concerns.

12.4 How to Exercise Your Rights

To exercise any of your rights, contact us at ritwik@seek-r.life with your name, email address, and a clear description of your request. We will respond within 30 days. For complex requests we may extend this period by a further two months, in which case we will notify you within the first 30 days. We may verify your identity before processing certain requests. We will not charge a fee for reasonable requests.

13. Security

We implement industry-standard technical and organisational measures to protect your personal data against unauthorised access, alteration, disclosure, destruction, or accidental loss. These measures include:

- Encryption of all data in transit using TLS 1.2 or higher
- Encryption of personal data at rest using AES-256
- Secure payment processing exclusively through Stripe, who are PCI-DSS compliant
- Role-based access controls ensuring only authorised personnel can access personal data
- Multi-factor authentication for all administrative and production system access
- Regular security assessments, penetration testing, and vulnerability scanning
- Incident response procedures including supervisory authority notification within 72 hours of becoming aware of a breach, and direct user notification where the breach poses a high risk to your rights and freedoms

No method of electronic storage or internet transmission is completely secure. While we strive to protect your data using commercially reasonable means, we cannot guarantee absolute security. In the event of a data breach affecting your rights and freedoms, we will notify you promptly in accordance with our legal obligations.

14. Children's Privacy

SeekR is not directed at children under the age of 16 (or 13 where a lower age threshold applies under local law). We do not knowingly collect personal information from children. If we become aware that a child has provided us with personal data without appropriate parental consent, we will delete that data promptly.

If you are a parent or guardian and believe your child has provided SeekR with personal information, please contact us immediately at ritwik@seek-r.life.

15. Third-Party Links and Integrations

Our Service may contain links to, or integrate with, third-party websites and platforms including airline booking platforms, hotel booking sites, mapping services, and travel information providers. SeekR is not responsible for the privacy practices, content, or data handling of any third-party platform.

When you click through to a third-party platform — whether via a SeekR recommendation or any other link — you leave the SeekR environment. We encourage you to read the privacy policy of each third-party platform before providing any personal information or completing any transaction.

In the future, where SeekR introduces affiliate links or partner integrations, this will be clearly disclosed to you at the point of interaction.

California residents: SeekR does not sell personal information as defined under the California Consumer Privacy Act. If you are a California resident with specific privacy requests, please contact ritwik@seek-r.life.

16. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our data practices, legal requirements, or Service features. Changes will fall into two categories:

Material changes — including changes to how we collect, use, or share personal data, changes to your rights, or changes to our legal bases for processing — will be notified to registered users via email at least 14 days before they take effect. We will display a prominent notice on seek-r.world. For material changes affecting consent-based processing, we will request fresh, explicit consent. If you do not agree to material changes, you may close your account before they take effect without penalty.

Minor changes — such as clarifications, typographical corrections, or updates to contact details — will take effect upon the 'Last Updated' date being updated, without prior notice.

Your continued use of the Service after the effective date of any change constitutes acceptance of minor changes. For material changes, we will obtain your acknowledgment where legally required.

17. Contact Us

For any questions, concerns, complaints, or requests relating to this Privacy Policy or our handling of your personal data, please contact us at ritwik@seek-r.life. We aim to acknowledge all enquiries within 2 business days and resolve them within 30 days. Supervisory authority contact details are listed in Section 12.